Congress of the United States

Washington, DC 20510

May 9, 2019

The Honorable Ajit V. Pai Chairman Federal Communications Commission 445 12th Street Southwest Washington, D.C. 20554

Dear Chairman Pai:

As the congressional delegation from the State of South Dakota, we write to you regarding ongoing efforts by the Federal Communications Commission (FCC) to identify the quality, accuracy, and usefulness of the data it collects on fixed and mobile broadband service in the United States. Only 65 percent of Americans in rural areas have access to high-speed fixed service, and on tribal lands, barely 60 percent have access compared to 97 percent of those in urban areas. Accurate broadband availability maps are a critical tool in closing the digital divide.

Current broadband availability maps are based largely upon whatever information may be received from providers. Although the FCC's database may represent the most complete repository of such information available today, there are several problems with the current maps. One example is that the maps are not granular enough. In the context of fixed broadband, an entire census block, which can be a large area in rural America, will appear as served even if service is offered to only one location within that census block. This can ultimately result in the denial funding or financing in such areas, leaving many locations without essential broadband service because they share a census block with a served household. Another significant concern is that the maps ultimately represent invalidated reports from providers. While providers certify as to the accuracy of information presented, the processes used to verify such information before funding or financing decisions are made can vary, and in many cases, such processes do not exist at all, meaning that funding or financing decisions flow directly from the maps themselves.

We are writing to ask the FCC to take immediate steps to address such concerns. In the first instance, it is important for the FCC to develop more standardized granular reporting of broadband availability while also balancing the burdens of reporting for smaller operators. One approach that could accomplish this is by having providers submit shapefiles, which show where service is actually available by detailing the actual contours of a provider's service area. Moreover, regardless of the method used to demonstrate broadband availability on a more granular basis, it is important to ensure separately and distinctly the accuracy of that more granular data.

As the Mobility Fund experience with wireless mapping indicated, reliance only upon selfreported data will not yield helpful information or good results. Therefore, we encourage the FCC to establish a meaningful challenge processes that will enable better validation of both fixed and mobile data prior to relying upon such data in making funding or financing decisions.

High-speed broadband services are vital to America's rural residents. Broadband connectivity provides opportunities for advancements in health care, education, and economic development. Thus, it is critical that the FCC take swift action to update its broadband data and mapping to ensure inaccurate information will not result in a denial of access to fixed or mobile broadband. A validated set of data based upon standardized methods of granular reporting will be essential to ensuring that universal service is available throughout rural America.

Thank you for your attention to this important matter. We look forward to working with you as the Commission continues its efforts to ensure all Americans have access to robust and reliable broadband.

Sincerely,

United States Senator

United States Senator

Member of Congress